

Exhibit N

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and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**DECLARATION OF DEANDRA FIKE IN SUPPORT OF
DEBTORS' FIRST OMNIBUS OBJECTION (SUBSTANTIVE)
TO CLAIM NOS. 523, 526, 527, 981, 982 AND 990 PURSUANT TO
11 U.S.C. § 502 AND FED. R. BANKR. P. 3007 (NO LIABILITY)**

I, Deandra Fike, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an associate at the law firm Cleary Gottlieb Steen & Hamilton LLP, counsel to the Debtors in the above-captioned chapter 11 case. I am duly admitted to this Court.

2. I respectfully submit this declaration in support of the *Debtors' Second Omnibus Objection (Substantive) to Claim Nos. 523, 526, 527, 981, 982 and 990 Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (No Liability) (the "Objection")*.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global HoldCo, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

3. On April 27, 2023 the Debtors made a production of approximately 350 pages to the Joint Liquidators, including further highly relevant documents regarding the parties' lending relationship and the assets underlying the proofs of claim numbered 981, 982 and 990 filed by Three Arrows Capital Ltd against Genesis Global Holdco, LLC ("Holdco"); Genesis Global Capital, LLC ("GGC"); and Genesis Asia Pacific Pte. Ltd. ("GAP") on August 18, 2023 (together, the "Amended PoCs").

4. On August 8 and August 9, 2023, the Debtors made additional productions of approximately 6,100 pages to the Joint Liquidators, including further documentation regarding the lending relationship.

5. True and correct copies of the following documents are attached to the Objection as exhibits O-AA.

- (a) Exhibit O: Master Loan Agreement between Genesis Global Capital, LLC and Three Arrows Capital Ltd dated January 10, 2019.
- (b) Exhibit P: Master Loan Agreement between Genesis Asia Pacific Pte. Ltd. and Three Arrows Capital Ltd dated January 24, 2020.
- (c) Exhibit Q: Assignment and Assumption of Master Loan Agreement between Genesis Global Capital, LLC, Genesis Asia Pacific Pte. Ltd., and Three Arrows Capital Ltd dated July 20, 2020.
- (d) Exhibit R: Assignment and Assumption Agreement between Genesis Asia Pacific Pte. Ltd. and Digital Currency Group, Inc., dated June 30, 2022.
- (e) Exhibit S: Assignment and Assumption of Master Loan Agreement between Genesis Asia Pacific Pte. Ltd. and Digital Currency Group, Inc., dated July 14, 2022.
- (f) Exhibit T: A series of Telegram communications involving Debtors and Three Arrows Capital Ltd relating to the transactions at issue.
- (g) Exhibit U: Margin call notices issued by Debtors to Three Arrows Capital Ltd on June 12, 2022 and June 13, 2022.
- (h) Exhibit V: Notice of Default issued by Genesis Global Capital, LLC and Genesis Asia Pacific Pte. Ltd. to Three Arrows Capital Ltd on June 13, 2022.

- (i) Exhibit W: Eastern Caribbean Supreme Court in the High Court of Justice, Commercial Division, Virgin Islands Judgment dated July 7, 2023.
- (j) Exhibit X: A series of Pledge Agreements involving Genesis Asia Pacific Pte. Ltd. and Three Arrows Capital Ltd relating to the transactions at issue.
- (k) Exhibit Y: A collection of Loan Documentation involving Genesis Asia Pacific Pte. Ltd. and Three Arrows Capital Ltd relating to the transactions at issue.
- (l) Exhibit Z: An email from Andrew Sullivan to Jacob Hinkle dated June 16, 2022.
- (m) Exhibit AA: A Microsoft Teams chat between Derar Islim, Matthew Ballensweig, Barry Silbert, Michael Moro, Michael Kraines, Michael Paleokrassas dated May 12, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 1, 2023 at New York, NY

/s/ Deandra Fike

Deandra Fike